



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MAR - 7 2011

**Ken Wainstein
O'Melveny & Myers LLP
1625 Eye Street, N.W.
Washington, D.C. 20006**

**RE: MUR 6447
Monica Turner**

Dear Mr. Wainstein:

On March 1, 2011, the Federal Election Commission accepted the signed conciliation agreement submitted on Monica Turner's behalf in settlement of a violation of 2 U.S.C. §§ 441a(a)(1)(A) and 441g, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter as it pertains to Ms. Turner.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply, and that this matter is still open with respect to other respondents. The Commission will notify you when the entire file has been closed.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the effective date of the conciliation agreement. If you have any questions, please contact me at (202) 694-1548.

Sincerely,

A handwritten signature in black ink that reads "Elena Paoli".

**Elena Paoli
Attorney**

**Enclosure
Conciliation Agreement**

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BEFORE THE FEDERAL ELECTION COMMISSION 7 PM 12: 53

In the Matter of

Monica Turner

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MUR 6447 OFFICE OF GENERAL
COUNSEL

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Monica Turner ("Respondent") violated 2 U.S.C. §§ 441a(a)(1)(A) and 441g.

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent is the sister of Michael Steele, a Senate candidate from Maryland in 2006.

2. Steele for Maryland, Inc., ("Federal Committee") is a political committee within the meaning of 2 U.S.C. § 431(4). Elisabeth S. Rubin is the treasurer of Steele for Maryland, Inc.

3. The Federal Election Campaign Act of 1971, as amended ("the Act") limits how much an individual may contribute to a candidate. 2 U.S.C. § 441a. In 2006, an individual could not contribute more than \$2,100 per election per candidate. 2 U.S.C. § 441a(a)(1)(A).

4. A "contribution" includes "any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office." 2 U.S.C. § 431(8)(A)(i). The term "contribution" does not include "the use of real or personal property ... and the cost of invitations, food, and beverages, voluntarily provided by an individual to any candidate ... on the individual's residential premises ... to the extent that the cumulative value ... does not exceed \$1,000 with respect to any single election, and ... does not exceed \$2,000 in any calendar year." 2 U.S.C. § 431(8)(B)(ii); 11 C.F.R. §§ 100.75 and 77.

Monica Turner's Payments of Expenses for Steele Fundraisers

5. In 2006, Monica Turner hosted two fundraisers at her Bethesda, Maryland, home to support Steele's Senate campaign. On July 8, 2006, prior to the primary election, Turner co-hosted a fundraising event. The invitation and response form state, "Paid For By Steele for Maryland, Inc." The invitation requests that contribution checks be made payable to "Steele for Maryland, Inc." Turner paid for the following Federal Committee expenses in connection with the July fundraiser:

Table One: Expenses for July Event

PAYEE	PURPOSE	AMOUNT	METHOD
Class Act Catering	Catering services	\$5,462.35	Check #6110 ¹
Rosa Vargas	Event help	\$250	Check #6111
Joy Sayoto	Event help	\$150	Check #6112
Roland [illegible]	Event security	\$250	Check #6114
Autopark Valet	Event valet service	\$466	Visa credit card
TOTAL		\$6,578.35	

Approximately 80 people attended the July 8, 2006, fundraiser and contributed \$44,450.

6. On October 21, 2006, prior to the general election, Turner hosted an event billed as a combination birthday party/fundraiser for Steele. The invitation and response form state, "Paid for By Steele for Maryland, Inc." The return address shows Turner's name and the campaign headquarters address. Turner paid for the following expenses in connection with the Oct. 21, 2006, fundraiser:

Table Two: Expenses for October Event

PAYEE	PURPOSE	AMOUNT	METHOD
Class Act Catering	Catering services	\$7,000	Check #6710
Rosa Vargas	Event help	\$300	Check #6711
[Illegible]	Event help	\$300	Check #6714
[Illegible]	Event security	\$250	Check #6713
TOTAL		\$7,850	

Approximately 95 people attended the October fundraiser and contributed \$48,570.

¹ The checks listed in Tables One, Two and Three refer to checks drawn on Monica Turner's personal checking account.

7. The Federal Committee was apparently low on funds throughout Fall 2006, and Turner paid for additional services and materials procured by it. The following are other expenditures paid by Turner on behalf of the Federal Committee:

Table Three: Additional Expenses Paid by Turner

PAYEE	PURPOSE	DATE PAID ²	AMOUNT	METHOD
Mike Richardson	Radio ad sound editor	Oct. 5, 2006	\$300	Check #6621
Eric Taylor	Email advertising blast	Oct. 10, 2006	\$1,500	Check #6701
Lorraine Treanor	Campaign office help	Oct. 13, 2006	\$800	Check #6705
Eric Taylor	Email advertising blast	Nov. 8, 2006	\$3,000	Check #6748
Eric Taylor	Email advertising blast	Nov. 8, 2006	\$2,000	Check #6750
Mike Richardson	Radio ad sound editor	Nov. 20, 2006	\$150	Check #6783
TOTAL			\$7,750	

8. Lastly, Turner made two cash contributions to the Federal Committee. On October 28, 2006, Turner gave Paul Ellington, a federal committee worker, \$6,000 in cash to purchase campaign "needs" such as telephoning and advertising. On November 4, 2006, Turner wrote a check to himself for \$8,500, cashed it, and gave the money to Ellington because the campaign needed to reserve radio advertising spots before the election.

² The dates in this table refer to the payment date.

Table Four: Cash Contributions

PURPOSE	DATE	CASH AMOUNT
"Campaign needs"	Oct. 28, 2006	\$6,000
Radio airtime	Nov. 4, 2006	\$8,500
TOTAL		\$14,500

9. In sum, Turner made in-kind and cash contributions to the Federal Committee totaling \$36,678.35. Turner was permitted to make \$4,200 in contributions to the Federal Committee for the primary and general elections in 2006, and she was permitted to spend \$1,000 for each in-home event she hosted. Steele for Maryland eventually reimbursed her in February 2007.

10. Turner contends that the violations were unintentional. The Commission has no information and has made no finding indicating that Turner acted knowingly and willfully in committing these violations.

V. Respondent violated the Act in the following ways:

1. Monica Turner made \$30,478.35 in excessive contributions to Steele for Maryland, Inc., in violation of 2 U.S.C. § 441a(a)(1)(A).
2. Monica Turner also made \$14,500 of those excessive contributions in cash, in violation of 2 U.S.C. § 441g.

VI. Monica Turner will cease and desist from violating 2 U.S.C. §§ 441a(a)(1)(A) and 441g.

VII. Monica Turner will pay a civil penalty to the Federal Election Commission in the amount of Five Thousand, Five Hundred dollars (\$5,500), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C.

§ 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondent shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

MUR 6447
Monica Turner
Conciliation Agreement

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:
Christopher Hughey
Acting General Counsel

BY: Kathleen Guith
Kathleen Guith
Acting Associate General Counsel
for Enforcement

3-7-11
Date

FOR THE RESPONDENT:

Monica Turner
Monica Turner

2/11/11
Date